## Case 1:23-cv-01537-IMF, Document 22 Filed 04/25/23 Rage 1 of 2

## & BENNETT LLC

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April 25, 2023

**LETTER MOTION** 

Application GRANTED.
Defendant's reply deadline is extended until one week after Plaintiff files his opposition.
Plaintiff will not be granted any further extensions. The Clerk of Court is directed to terminate ECF Nos. 20 and 21. SO ORDERED

April 25, 2023

## Via ECF

The Honorable Jesse M. Furman United States District Judge Southern District of New York 40 Centre Street, Room 2202 New York, NY 10007

Re: <u>Juan "Tony" Molina v. Palisades Federal Credit Union</u>

Case No.: 1:23-cv-01537-JMF

Dear Judge Furman:

By this letter motion, I respectfully, and urgently, request that the court further extend, to May 3, 2023, the deadline by which Plaintiff must respond to the defendant's motion to dismiss the Plaintiff's claims for failure to state a claim upon which relief may be granted. Pursuant to Your Honor's individual Rule 2.E, I note the following:

- 1. The original deadline for the Plaintiff's submission was April 12, 2023;
- 2. One (1) previous request was made to the court, which was...
- 3. granted, to April 26, 2023;
- 4. The undersigned counsel is attending to an on-going family medical issue involving the care of his 91 year-old mother and must travel urgently to South Carolina; counsel will return on or about Monday, May 1;
- 5. My adversary's consent has been requested but, as of the filing of this letter, has neither been granted nor denied (Counsel will apprise the court of any response received.)
- 6. The deadline for Defendant's reply is May 3, 2023---undersigned counsel proposes that the reply deadline be correspondingly extended.

Mindful that the court generally requires 48-hour notice for requests of this kind, I ask the court to consider the emergent circumstances animating this request.

Respectfully submitted,
GOODGOLD FEINBERG
& BENNETT LLC

DEAN T. BENNETT

DTB/jmm

Dictated but not read cc: Mr. Molina